IN2011.00025-A

Autoliv North America, IBC Facility
250 American Way
Brigham City, Utah 84302
UTD 982592479

Compliance Evaluation Inspection
February 16, 2011

HAZARDOUS WASTE INSPECTION REPORT

Facility Autoliv North America, IBC Facility (IBC Inflator Brigham City)

Date February 16, 2011

Facility Location 250 American Way
Brigham City, Utah 84302

EPA ID Number UTD 982592479

Facility Contact Kent Parkinson
EH&S Manager
Phone 435-734-6213
E-mail kent parkinson@autoliv com

Notification Small Quantity Generator (Large Quantity Generator for one month m 2010)

Part A None

Applicable Regulations R315-5, R315-9, R315-13, and R315-16 of the Utah Administrative Code

Type of Inspection Compliance Evaluation Inspection (CEI)

Participants Ed Deputy (Team Leader), DSHW
Rocky Stonestreet, DSHW
Kent Parkinson, Autoliv
Daren Koldewyn, Autoliv

Weather Conditions 52°F, Clear
Time In. 09 40 am
Time Out 12 25 pm

Report Prepared by Ed Deputy

Facility Description

Since 2003, the Autoliv North America, IBC Facility (Autoliv) is part of the Inflator group consisting of two facilities, one located in Ogden and one in Brigham City Those two facilities were consolidated in the first quarter of 2004 Since that consolidation and through continually applying APS principals, they are building approximately 20% more inflators annually with 50% fewer employees than prior to the consolidation

The Brigham City Facility consists of a 586,000 sq ft building which sits on 89 5 acres of land They have over 60 manufacturing lines and ship to 36 locations worldwide Included within the Brigham Facility is the Inflator Production, a Metrology Lab, a Machine Build group and an Environmental Testing Lab The products at the Brigham

City Facility include, Driver Airbag Inflators, Passenger Airbag Inflators, Side Impact Airbag Inflators, and Inflatable Curtain Airbag Inflators The Bngham City facility currently has 1,000 full time and 200 part time employees

Credentials, Purpose, and Scope The inspection team met with and presented credentials to Kent Parkinson of Autoliv The purpose of the inspection was to evaluate Autoliv's hazardous waste management practices for compliance with R315 of the Utah Administrative Code (the Rules) The scope of the inspection included a tour of the facilities

Waste Streams, Management Practices At the time of the inspection, Autoliv had generated approximately 700 pounds of hazardous waste for the month of February and was inspected for small quantity generator requirements The major hazardous waste streams produced at Autoliv are associated with waste inflator igniter The wastes include ignitable (D001), reactive (D003), and lead (D008) charactenstic hazardous wastes Autoliv operates eight satellite accumulation areas All containers were properly labeled and closed The 90-day hazardous waste accumulation area is a steel explosion proof container building located west of the main facility There were two hazardous waste containers in storage at the time of inspection One 15-gallon container contained contaminated trash dated 2-16-11 and one 5-gallon bucket contained flammable solids dated 2-15-11 Both containers were properly labeled, dated, and closed The majority of Autoliv's hazardous wastes are transported by Enviro Care Inc to Clean Harbors in Tooele County for disposal The 1-3C reactive hazardous waste is transported to Veolia ES Tech Solutions in Sauget, IL for disposal Dunng the inspection it was noted that emergency information required by R315-5-3 34 had not been posted near telephones in the areas where hazardous waste is generated

Plans and Procedures

The Personnel Training Plan, Contingency Plan, and Preparedness and Prevention Plans were not evaluated as a Small Quantity Generator requirement

R315-5 Hazardous Generator Requirements

5-1 Applicability Based Autoliv's hazardous waste generation rate, Autoliv is a small quantity generator for most of the year
5-1 11 Determination of Whether a Waste is a Hazardous Waste OK
5-1 12 Identification Numbers UTD 982592479
5-2 Manifest OK
5-3 Pre-Transportation Requirements Packaging, Labeling, Marking, and Placarding OK
5-3 34 Accumulation Time Emergency information should be posted nears phones
5-4 40 Recordkeeping OK
5-4 41 Biennial Reporting OK
5-4 42 Exception Reporting NA
5-4 43 Additional Reporting NA
5-5 Exports of Hazardous Waste NA
5-6 Imports of Hazardous Waste NA
5-7 Farmers NA
5-8 Transfrontier Shipments of Hazardous Waste for Recovery with the OECD NA

R315-9 Emergency Controls

Autoliv has not had a situation requiring an emergency response

R315-13 Land Disposal Restrictions

13-1 OK

R315-16 Standards for Universal Waste Management

16-1 Scope OK
16-2 Standards for Small Quantity Generators of Universal Waste OK
16-3 Standards for Large Quantity Generators of Universal Waste NA
16-4 Standards for Universal Waste Transporters NA
16-5 Standards for Destination Facilities NA
16-6 Import Requirements NA
16-7 Petitions to Include Other Wastes Under R315-16 NA

Signature
Ed Deputy, Team Leader

February 24, 2011

Date

Site Autoliv, North America, IBC ID# UTD 982592479 Date Feb, 16, 204

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Waste Determination Has the generator determined whether his solid waste is a hazardous waste?	R315-5-1 11 262 11	Yes
Has a waste determination been made for each waste stream?	R315-2-3 262 3	Yes
Notification and EPA Hazardous Waste Identification Numbers Has the generator notified of regulated activity and obtained an EPA ID#?	R315-5-1 12 262 12	Yes
Has the generator offered his hazardous waste to a transporter or a treatment, storage, or disposal facility (TSDF) that does not have an EPA ID#?	R315-5-1 12 262 12	No
Manifest Has the generator used the approved manifest form 8700-22 and 8700-22A for off-site transportation to a TSDF?	R315-5-2 20 (a) 262 20(a)	Yes
Have all applicable sections of each manifest been filled out completely and legibly? (See attached manifest checklist)	R315-5-2	Yes
Does the facility generate less than 1000 kg/month and use a contractual agreement to reclaim his waste?	R-315-5-2 20(e)(1) 262 20(e)	NO
Have copies of the reclamation agreements been kept on file for at least three years after termination of the agreement?	R-315-5-2 20(e)(2) 262 20(e)	NA
Record Keeping Is the generator maintaining signed copies of the manifests for three years?	R-315-5-4 40(a) 262 40(a)	Yes
Is the generator maintaining records of test results or waste analyses for hazardous waste determinations for at least three years?	R-315-5-4 40(c) 262 40(c)	Yes
Exception Reporting Has the generator been required to prepare an Exception Report (if the TSDF does not return the generator's original copy of the manifest within 60 days)? If yes, the generator must submit a legible copy of the manifest to the Executive Secretary, with some indication that the confirmation of delivery to the TSDF has not been received	R315-5-4 42(b) 262 42(b)	NO
Has the generator kept a copy of each Exception Report for at least threes years?	R315-5-4 40(b) 262 40(b)	NA

Inspector's Initials SJO

Site Autoliv North America, IBC ID# UTD 982592479 Date Feb. 16, 2011

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Packaging, Labeling, Marking, and Placarding Are hazardous waste containers packaged, labeled, marked, and placarded in accordance with DOT 49 CFR prior to shipment?	R315-5-3 262 30, 262 31, 262 32, & 262 33	Yes
Accumulation Time Has the generator stored hazardous wastes on-site for longer than 180 days or 270 days (if the wastes are transported over 200 miles to a TSDF) without a permit?	R315-5-3 34 262 34(d) & 262 34(e)	No
Has the generator ever accumulated more than 6000 kg of hazardous waste on-site?	R315-5-3 34 262 34(d)(1)	No
The date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container of hazardous waste	R315-5-3 34 262 34(d)(4) 262 34(a)(2)	OK
While being accumulated on-site each container and tank is labeled or marked clearly with the words, "Hazardous Waste"	R315-5-3 34 262 34(d)(4) 262 34(a)(3)	OK
Does the facility have at least one person on the premises or on call (available to reach the facility in a short period of time) with the responsibility for coordinating all emergency response measures This employee is the emergency coordinator	R315-5-3 34 262 34(d)(5) 262 34(d)(5)(i)	Yes
* Has the generator posted the following information next to the telephone Name and phone number of emergency coordinator, Location of fire extinguishers, spill control material, and if present, fire alarm, and Telephone number of the fire department, unless the facility has a direct alarm	R315-5-3 34 262 34(d)(5) 262 34(d)(5)(ii)	No. need to post information near telephone.
Does the generator ensure that all employees are thoroughly familiar with the hazardous waste handling and emergency procedures relevant to their positions?	R315-5-3 34 262 34(d)(5) 262 34(d)(5)(iii)	Yes
Will the Emergency Coordinator or his designee be available to respond to any emergencies that arise Applicable responses are specified in 262 34(d)(5)(iv)	R315-5-3 34 262 34(d)(5) 262 34(d)(5)(iv)	Yes
Use and Management of Containers Are hazardous waste containers in good condition?	R315-5-3 34 262 34(d)(2) 265 171	Yes

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Site Autoliv North America, IBC ID# UTD 982592479 Date Feb. 16, 2011

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Are the containers compatible with the hazardous waste?	262 34(d)(2) 265 172	Yes
Are hazardous waste containers closed except when adding or removing waste?	262 34(d)(2) 265 173(a)	Yes
Containers must not be opened, stored or handled in a way that may cause them to rupture or leak hazardous waste	262 34(d)(2) 265 173(b)	OK
Hazardous waste containers must be inspected weekly looking for unlabeled, leaking and deteriorated containers	262 34(d)(2) 265 174	OK
Incompatible wastes must not be stored in the same containers	262 34(d)(2) 265 177(a)	OK
Are hazardous wastes placed in containers that previously held an incompatible waste?	262 34(d)(2) 265 177(b)	NO
Are incompatible hazardous wastes containers separated from incompatible wastes by means of a dike, berm, wall, or other device?	262 34(d)(2) 265 177(c)	OK
Preparedness and Prevention Is the facility maintained and operated in a way to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste	R315-5-3 34 262 34(d)(4) 265 31	Yes
Does the facility have the following equipment unless the wastes stored do not pose the hazards that the equipment is designed to respond to internal communications or alarm capable of providing immediate emergency instructions (voice or signal) to facility personnel, a device capable of summoning outside emergency equipment (such as a telephone or a direct line to the fire department), portable fire extinguishers, fire control equipment, spill control equipment, decontamination equipment, water at adequate pressure and volume to supply fire fighting needs	262 34(d)(4) 265 32	Yes
Does the facility must maintain and test, where necessary, all communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment to assure proper operation when needed	262 34(d)(4) 265 33	Yes

Inspector's Initials [illegible]

Site _____ ID# _____ Date _____

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Do facility personnel have immediate access to an alarm or emergency communication device whenever hazardous waste is handled and if there is ever just one employee on the premises during facility operation, does he have immediate access to a device (telephone or two-way radio) capable of summoning external emergency assistance?	262 34(d)(4) 265 34	Yes
Does the facility maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment?	262 34(d)(4) 265 35	Yes
Has the facility attempted to make arrangements with local fire, police, emergency response teams, and hospitals to respond to emergency situations? The facility must document any refusal to enter into such arrangements	262 34(d)(4) 265 37	Yes
Spill Response Take appropriate action to minimize threats to human health and the environment by notifying the Utah Department of Environmental Quality at (801) 536-4123 if more than 1 kg of acutely hazardous waste, 100 kg of hazardous waste or material which when spilled becomes a hazardous waste, or 25 gallons of used oil Provide information as required	R315-9 R315-9-1	NA
Notify and report to the National Response Center, at 800-424-8802, if required	R315-9-1 1	NA
Provide a written report including all information required in R315-9-4 to the Executive Secretary within 15 days after any spill of hazardous waste or material which becomes a hazardous waste when spilled and is reported under R315-9-1	R315-9-4	NA
Land Disposal Restrictions (LDR) Is the facility managing and treating hazardous waste to meet Land Disposal Restriction standards found at 268 40 The generator must also develop and follow a written waste analysis plan which describes the procedures they will carry out to comply with the treatment standards The waste analysis plan must be based on a chemical and physical analysis of a representative sample of the waste being treated Such plans must be kept m the facility's on-site files and available to inspectors Wastes shipped off-site pursuant to this paragraph must comply with the notification requirements of 268 7(a)(3)	R315-13-1 262 34(d)(4) 268 7(a)(5)	OK

Inspector's Initials GW

Site Autoliv North America, Inc ID# UTD 982592479 Date Feb. 16, 2011

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
If the hazardous waste meets the treatment standard at the original point of generation, with each initial shipment of waste or if the waste changes, the generator must send a one-time written notice to each treatment, storage, or disposal facility receiving the waste, and keep a copy in the file The notice must include the information included in column "268 7(a)(3)" in the Table m 268 7(a)(4)	262 34(d)(4) 268 7(a)(5) 268 7(a)(3)	OK
Does the facility maintain an assessment of LDR status on file for each hazardous waste generated at the facility	R315-13-1 268 7(a)	Yes
A notice and certification that each hazardous waste is either not land disposal restricted, or if it is restricted, that it is land disposable after treatment, must accompany the original manifested shipment of hazardous waste or when the waste stream changes	R315-13-1 268 7(a)	OK
Maintain all LDR documentation for at least three years from the date the hazardous waste was shipped off-site	R315-13-1 268 7(a)(8)	OK
Standards for Universal Waste Management High mercury contamng lamps must be recycled or disposed of as hazardous waste Any broken lamps must be disposed of as a hazardous waste Do not dispose of high mercury containmg lamps in the regular trash or dumpster	R315-16 R315-16-2	OK
Container of mercury containing lamps must be closed and labeled "Universal Waste Lamps", "Waste Lamps", or "Used Lamps"	R315-16-2	OK
Universal waste lamps should not be accumulated for longer than one year	R315-16-2	OK
Are rechargeable batteries recycled or managed as a hazardous waste, kept m a closed contamer labeled "Universal Waste Batteries", and not accumulated for longer than one year	R315-16-2	OK

Inspector's Initials EM

Site Autoliv ID# UTD ~~980074742~~ 98259247 9 Date Feb. 16, 2011

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS		
Manifest Number (box)	#000208547	#000208563	#000208533	#000208693
Generator EPA ID # R315-5-2 (box 1	okay	ok	ok	ok
Generator information				
Mailing Address (box 5)				
Phone number	ok	ok	ok	ok
Transporter #1 information				
Company Name (box 6)				
EPA ID# (box 6)	ok	ok	ok	ok
Transporter #2 information				
Company Name (box 7)				
EPA ID # (box 7)	ok	ok	ok	ok
Designated Facility information				
Name and Address (box 8)				
EPA ID # (box 8)				
Phone Number (box 8)	ok	ok	ok	ok
Waste shipping requirements				
DOT Description (including proper name, Hazard class and ID#) (box 9b)				
(box 9a "X" if hazardous materials)				
Containers No & Type (box 10)	ok	ok	ok	ok
Total Quantity (box 11)				
Unit – Wt/Vol (box 12)				
Waste Codes (box 13)				
Special Handling Instructions (box 14)	ok	ok	ok	ok
Manifest Certifications				
Generator's Signature (box 15)				
International Shipments (box 16)				
Transporter's Signature (box 17)				
Discrepancy Indication (box 18)	ok	ok	ok	ok
Hazardous Waste Report Management Method Codes (box 19)				
Facility Signature (box 20)	ok	ok	ok	ok
Final Observations and Comments	No concerns	No concerns	No concerns	No concerns

Inspector's Initials RLS

Site Autoliv North America, IBC ID# UTD 982592479 Date Feb. 16, 2014

Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Requirements for SQGs that Accumulate Hazardous Waste in Tanks	262 34(d)(3) 265 201	NA
A generator may accumulate hazardous waste in tanks for less that 180 days (or 270 days if the generator must ship the waste greater than 200 miles), and may not accumulate over 6,000 kg on-site at any time	R315-5-3 34 262 34(d)(3) 265 201(a)	No hazardous waste tanks.
Treatment or storage of hazardous waste in tanks must not generate extreme heat or pressure, fire or explosion, or violent reaction, produce toxic mists, fumes, dusts, or gases, produce uncontrolled flammable fumes or gases, damage the device or facility containing the waste, or threaten human health or the environment	R315-5-3 34 262 34(d)(3) 265 201(b)(1)	
Hazardous waste or treatment reagents must not be placed in a tank if it could cause it to fail	R315-5-3 34 262 34(d)(3) 265 201(b)(2)	
Uncovered tanks must have 2 feet of freeboard, unless the tank has a containment structure that equals or exceeds the volume of the top 2 feet of the tank	R315-5-3 34 262 34(d)(3) 265 201(b)(3)	
If hazardous waste is continuously fed into a tank, the tank must be equipped to the inflow (waste feed cutoff or by-pass system to stand-by tank)	R315-5-3 34 262 34(d)(3) 265 201(b)(4)	
Small Quantity Generators that store hazardous waste in tanks must inspect, where present	262 34(d)(3) 265 201(c)	
Discharge control equipment at least once each operating day to ensure good working order	262 34(d)(3) 265 201(c)(1)	
Data from monitoring equipment at least once each operating day to ensure that the tank is operated to its designs	262 34(d)(3) 265 201(c)(2)	
The level of the waste in the tank at least once each operating day to ensure compliance with freeboard, if required	262 34(d)(3) 265 201(c)(3)	
The tank construction materials at least weekly to detect corrosion or leaking seams or fixtures	262 34(d)(3) 265 201(c)(4)	
The construction and surrounding area of discharge confinement structures at least weekly to detect erosion or signs of leakage	262 34(d)(3) 265 201(c)(5)	

Inspector's Initials